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16 *Attorneys for Defendants Panasonic Corporation, Panasonic Corporation of North America, and*
17 *MT Picture Display Co., Ltd.*

18 **IN THE UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
19 **SAN FRANCISCO DIVISION**

20 In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

MDL No. 1917
Master No. 3:07-cv-05944-SC

21 This Document Relates to:
22 ALL ACTIONS
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**DECLARATION OF ADAM C.
HEMLOCK IN SUPPORT OF THE
PANASONIC DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL CERTAIN DEFENDANTS'
NOTICE OF MOTION AND MOTION
FOR PARTIAL SUMMARY JUDGMENT
WITH RESPECT TO DAPS' ALLEGED
DIRECT DAMAGE CLAIMS BASED ON
PURCHASES FROM SANYO**

1 I, Adam C. Hemlock, hereby declare as follows:

2 1. I am an attorney with Weil, Gotshal & Manges LLP, counsel for Defendants Panasonic
3 Corporation, Panasonic Corporation of North America, and MT Picture Display Co., Ltd.
4 (collectively, the “Panasonic Defendants”) in these actions. I am a member of the bar of the State of
5 New York and I am admitted to practice before this Court *pro hac vice*.
6

7 2. I submit this Declaration in Support of the Panasonic Defendants’ Administrative Motion to
8 File Under Seal Certain Defendants’ Motion for Partial Summary Judgment with Respect to Direct
9 Action Plaintiffs’ Alleged Direct Damage Claims Based on Purchases from Sanyo Entities. I have
10 personal knowledge of the facts stated herein and, if called as a witness, I could and would
11 competently testify thereto.
12

13 3. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter (No. 07-
14 cv-05944, Dkt. No. 306, amended at Dkt. No. 1142) (the “Protective Order”).

15 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the Panasonic
16 Defendants seek to seal the following concurrently-filed documents: (a) the highlighted portions of
17 Certain Defendants’ Notice of Motion and Motion for Partial Summary Judgment with Respect to
18 Direct Action Plaintiffs’ Alleged Direct Damage Claims Based on Purchases from Sanyo Entities
19 (“Certain Defendants’ Partial Summary Judgment Motion with Respect to Sanyo”); and (b) Exhibits
20 A, B, C, D, E, F and I to the concurrently-filed Declaration of Adam C. Hemlock In Support of
21 Certain Defendants’ Motion for Partial Summary Judgment with respect to Direct Action Plaintiffs’
22 Alleged Direct Damage Claims Based on Purchases from Sanyo Entities (the “Hemlock Declaration
23 ISO Certain Defendants’ Partial Summary Judgment Motion with Respect to Sanyo Damages”).
24

25 5. Exhibit A to the Hemlock Declaration ISO Certain Defendants’ Partial Summary Judgment
26 Motion with Respect to Sanyo are excerpts from the April 15, 2014 Expert Report of Alan Frankel,
27 Expert for Plaintiff Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services,
28

1 Inc., Best Buy Stores, L.P., BestBuy.com, L.L.C., and Magnolia Hi-Fi, LLC (“Best Buy”), which
 2 Best Buy has designated as “Highly Confidential” in its entirety under the terms of the Protective
 3 Order.

4 6. Exhibit B to the Hemlock Declaration ISO Certain Defendants’ Partial Summary Judgment
 5 Motion with Respect to Sanyo are excerpts from the April 15, 2014 Expert Report of Alan Frankel,
 6 Expert for Plaintiff Interbond Corporation of America, d/b/a BrandsMart USA (“BrandsMart”),
 7 which BrandsMart has designated as “Highly Confidential” in its entirety under the terms of the
 8 Protective Order.

9 7. Exhibit C to the Hemlock Declaration ISO Certain Defendants’ Partial Summary Judgment
 10 Motion with Respect to Sanyo are excerpts from the April 15, 2014 Expert Report of Alan Frankel,
 11 Expert for Plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust
 12 (“Circuit City”), which Circuit City has designated as “Highly Confidential” in its entirety under the
 13 terms of the Protective Order.

14 8. Exhibit D to the Hemlock Declaration ISO Certain Defendants’ Partial Summary Judgment
 15 Motion with Respect to Sanyo are excerpts from the April 15, 2014 Expert Report of Alan Frankel,
 16 Expert for Plaintiff Costco Wholesale Corporation (“Costco”), which Costco has designated as
 17 “Highly Confidential” in its entirety under the terms of the Protective Order.

18 9. Exhibit E to the Hemlock Declaration ISO Certain Defendants’ Partial Summary Judgment
 19 Motion with Respect to Sanyo are excerpts from the April 15, 2014 Expert Report of Alan Frankel,
 20 Expert for Plaintiff Sears Roebuck and Co. and Kmart Corp. (“Sears/Kmart”), which Sears/Kmart
 21 has designated as “Highly Confidential” in its entirety under the terms of the Protective Order.

22 10. Exhibit F to the Hemlock Declaration ISO Certain Defendants’ Partial Summary Judgment
 23 Motion with Respect to Sanyo is Plaintiff Sears/Kmart’s Objections and Responses to Defendants
 24 Panasonic Corp. and LGE’s First Interrogatories, dated December 31, 2013. Sears/Kmart has

1 designated this document as “Highly Confidential” in its entirety under the terms of the Protective
2 Order.

3 11. Exhibit I to the Hemlock Declaration ISO Certain Defendants’ Partial Summary Judgment
4 Motion with Respect to Sanyo is Plaintiff Sharp Electronics Corporation and Sharp Electronics
5 Manufacturing Company of America, Inc.’s (“Sharp”) Responses and Objections to Defendants
6 Panasonic Corp. and LGE’s First Interrogatories, dated July 22, 2013. Sharp has designated this
7 document as “Confidential” in its entirety under the terms of the Protective Order. The highlighted
8 portions of pages 5 and 13 of Certain Defendants’ Partial Summary Judgment Motion with Respect
9 to Sanyo Damages reference confidential information contained in Exhibit I.
10

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed on November 7, 2014 at New York, New York.

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14 By: /s/ Adam C. Hemlock
ADAM C. HEMLOCK
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